# UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Hon. Michael Shipp

v.

ALEJANDRO VALDEZ,

Magistrate No. 11-6000

VICTOR ARIAS, JOSE DELORBE,

JORGE GUERRA, & CHRISTIAN COLON

CRIMINAL COMPLAINT

I, William Brinker, being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 22, 2011 in Hudson County in the District of New Jersey, defendants ALEJANDRO VALDEZ, VICTOR ARIAS, JOSE DELORBE, JORGE GUERRA, and CHRISTIAN COLON:

#### SEE ATTACHMENT A

I further state that I am a Special Agent with the Drug Enforcement Administration and that this complaint is based on the following facts:

#### SEE ATTACHMENT B

continued on the attached page and made a part hereof.

Special Agent William Brinker Drug Enforcement Administration

Sworn to before me and subscribed in my presence, January 31, 2011, at Newark, New Jersey.

HONORABLE MICHAEL SHIPP

United States Magistrate Judge

## ATTACHMENT A

did knowingly and intentionally conspire and agree with each other and with others to manufacture and possess with intent to manufacture 1 kilogram or more of heroin, a Schedule I narcotic drug controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), in violation of Title 21, United States Code, Section 846.

### ATTACHMENT B

- I, William Brinker, am a Special Agent with the Drug Enforcement Administration. I have knowledge of the facts set forth below from my involvement in the investigation, a review of reports, and discussions with other law enforcement personnel. Any statements attributed to individuals are described in substance and in part.
- 1. On or about January 22, 2011, law enforcement received information that several men were manufacturing controlled substances at 6120 Washington Street in West New York, New Jersey (the "Heroin Mill").
- 2. Law enforcement officers responded to the Heroin Mill and knocked on the door.
- 3. Defendant VALDEZ opened the door. Law enforcement officers could see through the open door materials that they believed to be a controlled substance and related manufacturing and packaging materials for controlled substances inside the Heroin Mill.
- 4. Law enforcement entered the Heroin Mill and discovered defendants ARIAS, DELORBE, GUERRA, and COLON inside. These defendants were placed under arrest, along with defendant VALDEZ.
- 5. Law enforcement subsequently obtained a search warrant to search the Heroin Mill. In the course of executing this warrant, law enforcement seized, among other items, over two kilograms of a substance that field-tested positive for heroin, four plants believed to be marijuana, and large quantities of material and equipment associated with manufacturing and packaging controlled substances for retail distribution.